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January 30, 2004

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the HPV Test Plan for 2,2-bis{[3-(dodecylthio)-1-oxopropoxy]methyl}propane-1,3-diyl bis[3-(dodcecylthio) propionate

Dear Administrator Leavitt:

The following comments on Crompton's test plan for the chemical 2,2-bis{[3-(dodecylthio)-1-oxopropoxy]methyl}propane-1,3-diyl bis[3-(dodcecylthio) propionate are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

The Crompton Corporation submitted its test plan on August 27, 2003, for the chemical 2,2-bis{[3-(dodecylthio)-1-oxopropoxy]methyl}propane-1,3-diyl bis[3-(dodcecylthio) propionate, also referred to as Propionic acid, 3-(dodecylthio)-, neopentanetetrayl ester(CAS No. 29598-76-3), an antioxidant for use with polyolefins and engineering plastics. Crompton has utilized structure activity relationship programs and models, specifically ECOSAR, to estimate toxicity to fish and other aquatic organisms. Based on modeled data, the sponsor states "toxicity to aquatic organisms is estimated to occur at a level higher than the estimated solubility of the chemical" (Test Plan, p. 6) and appropriately concludes that this chemical is not predicted to pose an acute hazard in an aquatic environment. We commend this approach for estimating ecotoxicity.

At this time, however, we would like to point out that this test plan is very brief and lacks significant detail. Specifically, the sponsor does not mention the location or process by which this chemical is made, nor is the potential for human or environmental exposure addressed in this test plan. We are also concerned that little attempt has been made to categorize propionic acid, 3-(dodecylthio)-, neopentanetetrayl ester with similar compounds. Crompton Corporation proposes a combined repeated dose/reproductive/developmental test (OECD 422), which we feel, is premature before looking at all existing data on analogous chemicals. This test alone will result in the death of at least 675 animals. We recommend that Crompton identify the compounds, if

any, that can be expected to be of similar toxicity to this chemical, as data for similar chemicals may be used to bridge data gaps for repeated dose, reproductive, and developmental toxicity endpoints. Thank you for your attention to these comments. I can be reached at 202-686-2210, ext. 327 or by email at *meven@pcrm.org*.

Sincerely,

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Research Analyst

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Director of Toxicology Research